

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE SESEN BIO, INC. SECURITIES
LITIGATION

Case No.: 1:21-cv-07025-AKH

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR
(I) PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT; (II) CERTIFICATION OF THE SETTLEMENT CLASS;
AND (III) APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS
OF RECORD HEREIN:

PLEASE TAKE NOTICE that Lead Plaintiffs Ryan Bibb, Rodney Samaan, Lionel Dreshaj, and Benjamin Dreshaj (collectively, “Plaintiffs”), will and hereby move this Court on a date and at such time as may be designated by the Honorable Alvin K. Hellerstein, Courtroom 14D, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order: (i) granting preliminary approval of the proposed Settlement; (ii) certifying the putative Settlement Class for purposes of settlement only; (iii) granting approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; and (iv) setting a date for a final Settlement Hearing and deadlines for providing notice of the Settlement, the filing of Settlement Class Member objections, the submission of requests for exclusion by Settlement Class Members, the filing of Plaintiffs’ motion for final approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.¹

This motion is based upon the concurrently filed Memorandum of Law, the Houston Declaration, and other such matters and argument as the Court may consider at the hearing on this motion. The Defendants, as defined in the Stipulation, do not oppose this motion.

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated August 3, 2022 (the “Stipulation”), which is attached as Exhibit 1 to the Declaration of Matthew M. Houston in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (“Houston Declaration”).

DATED: August 16, 2022

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Attorneys for Lead Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of August 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Matthew M. Houston
Matthew M. Houston